

November 20, 2024

**VIA ECF**

Hon. Vernon S. Broderick  
 U.S. District Judge  
 Thurgood Marshall  
 United States Courthouse  
 40 Foley Square  
 New York, NY 10007

**Re: *Brown v. Frankie Shop LLC et al*, Civ. No. 24-cv-05688-VSB  
 Letter Motion on Consent Requesting Extensions of Time to Respond to Plaintiff's  
 Complaint and Defendant Flemington Estates LLC's Crossclaim**

Dear Judge Broderick:

As you are aware, we represent Defendant Frankie Shop LLC ("Frankie Shop") in the above-referenced action. Frankie Shop respectfully moves the Court to reset the following deadlines as set forth in the below chart:

| <b>EVENT</b>   | <b>CURRENT DEADLINE</b> | <b>REQUESTED EXTENSION</b> |
|--|-------------------------|----------------------------|
| Frankie Shop's deadline to answer, move, or otherwise respond to Plaintiff's Complaint                         | November 25, 2024       | January 9, 2025            |
| Frankie Shop's deadline to answer, move, or otherwise respond to Defendant Flemington Estates LLC's Crossclaim | December 4, 2024        | January 9, 2025            |

Both Plaintiff's counsel and Defendant Flemington Estates LLC's counsel consent to these respective requests for extensions of time.

Frankie Shop previously requested the following: (i) two extensions of time to answer, move, or otherwise respond to Plaintiff's Complaint (Dkts. 12 and 18), which the Court granted on August 15, 2024 and October 21, 2024, respectively (Dkts. 13 and 19); and (ii) one extension of time to extend its deadline to answer, move, or otherwise respond to Defendant Flemington Estates LLC's Crossclaim (Dkt. 18), which the Court granted on October 21, 2024. (Dkt. 19.) Frankie Shop seeks these extensions to permit the parties to continue meaningful discussions regarding Plaintiff's allegations.

We thank the Court for its time and courtesies.

Respectfully submitted,

/s/ Mary Kate Brennan

Mary Kate Brennan  
Senior Attorney

cc: All counsel of record (via ECF)